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December 17, 1997

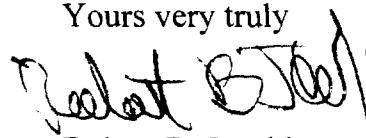
VIA HAND DELIVERY

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Dear Ms. Salas

On behalf of Golden Orange Broadcasting Co., Inc., licensee of television station KDOC, Anaheim, California, there are herewith transmitted an original and nine copies of its "Comments of Golden Orange Broadcasting Pertaining to Reply Comments of Tribune Broadcasting Submitted in Docket No. 97-157."

Yours very truly


Robert B. Jacobi

RBJ:btc

Enclosures

97-157

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BEFORE THE
Federal Communications Commission

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In the Matter of

Advanced Television Systems and Their
Impact Upon the Existing Television
Broadcast Service

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MM Docket No. 87-268

TO: The Commission

**COMMENTS OF GOLDEN ORANGE BROADCASTING
PERTAINING TO REPLY COMMENTS OF TRIBUNE
BROADCASTING SUBMITTED IN DOCKET NO. 97-157**

Tribune Broadcasting Company, licensee of television station KTLA, Los Angeles, California (hereinafter "Tribune"), filed "Reply Comments" in Docket No. 97-157. In the Sixth Report and Order, Tribune was allotted DTV Channel 68. In the aforesaid Reply Comments, Tribune suggests that the Commission should allot DTV Channel 31 to Station KTLA. On behalf of Golden Orange Broadcasting Co., Inc., licensee of Station KDOC-TV, Anaheim, California, there is herewith transmitted its Comments on the Tribune proposal.^{1/}

1. The Sixth Report and Order allotted DTV channels 68 to Station KTLA and 32 to Golden Orange. Tribune acknowledges that its proposed DTV Channel 31 allocation does not satisfy the Commission's co-channel spacing requirements for DTV-NTSC allocations in Zone 2. Moreover, the Tribune interference showing reflects that 246,000 people constituting 2.1% of the population within the predicted Channel 32 Grade

^{1/} The Channel 31 proposal contained in the Tribune Reply Comments directly bears upon the MSTV Ex Parte Submission.

B contour will receive interference from a Channel 31 operation and that 165,000 people within the Channel 31 Grade B contour will receive adjacent channel interference. The deviation from the Commission rules and the degree of interference is more than minimal (see Engineering Statement).

2. Indeed, there is no reason justifying any new allocation for KTLA. The Sixth Report and Order allotted Channel 68 to Station KTLA and Channel 69 to Station KRCA, Riverside, California. These allotments were short-spaced and, further, the Channel 69 allotment was defective since it failed to take into account the protection necessary to afford land mobile operations in the Los Angeles area on Channel 70. The MSTV Submission remedies this situation by substituting Channel 61 for Channel 69, thereby establishing the continued viability of Channel 68; consequently the FCC allotment of Channel 68 to KTLA remains valid.

Respectfully submitted,

GOLDEN ORANGE BROADCASTING CO., INC.

By: 

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Date: December 17, 1997

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**ENGINEERING STATEMENT
PREPARED ON BEHALF OF
GOLDEN ORANGE BROADCASTING CO., INC.
ANAHEIM, CALIFORNIA**

The instant Engineering Statement has been prepared on behalf of Golden Orange Broadcasting Co., Inc. (hereafter, Golden Orange), licensee of station KDOC-TV, Anaheim, California. Station KDOC-TV operates on channel 56 and has been allotted channel 32 for DTV use in the FCC's Sixth Report and Order.

In ET Docket Number 97-157 in the matter of Reallocation of Television Channels 60-69, the 746-806 MHz Band, Tribune Broadcasting Co., licensee of station KTLA-TV, Los Angeles, California, submitted a Reply Comment suggesting that channel 31 would be a viable alternative allotment to channel 68 for DTV use for KTLA-TV.

The Engineering Statement accompanying the Tribune pleading attempts to support the claim that a DTV channel 31 operation for KTLA-TV would be "a viable alternative to DTV channel 68 for KTLA-TV." The study admits that the FCC's replication procedures were not followed. The study attempts to minimize the interference to approximately 246,000 persons within

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Engineering Statement
Station KDOC-TV, Anaheim, CA

Page 2

the KDOC-TV channel 32 DTV operation that would arise from the so-called "viable alternative" by claiming that it is only 2.1 percent of the population that would otherwise be served by KDOC-TV. What nonsense! 246,000 persons lost due to interference is a significant number in anyone's book.

The stated concern for the channel 31 substitution is to eliminate NTSC/VHF to DTV/UHF allotments in the channel 60-69 range since, it is argued, such operations would hinder use of the spectrum by land mobile operators. It is claimed the relatively high replication powers needed for VHF stations when such stations operate in the channel 60-69 band serve as a bar to the use of adjacent channels by land mobile stations.


The argument is not well taken since even more modest powers needed for NTSC/UHF to DTV/UHF facilities would still be a bar to the use of adjacent channels by land mobile operators. Moreover, under the FCC Rules, the allotted replication powers for NTSC/UHF to DTV/UHF stations would not necessarily be the operating powers. The Rules permit increased power up to the maximum usage in the community if allocation factors permit.

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Engineering Statement
Station KDOC-TV, Anaheim, CA

Page 3

It is noted that the Association for Maximum Service Television, Inc. and other broadcasters have submitted a document in MM Docket Number 87-268 entitled, "Ex Parte Submission Based on New Technical Discoveries to Help the Commission Improve the DTV Table of Allotments/Assignments" in which a revision of the table of allotments is suggested for the Los Angeles area. The suggested new table reduces the number of DTV allotments in the channel 60-69 range from six to two. The important point is that the rearrangement of channels was accomplished using the FCC's replication procedures. Thus, whether or not the ultimately adopted table includes fewer than six DTV channels in the channel 60-69 range, a reduction, which if deemed sufficiently beneficial by the FCC, can be achieved without resorting to nonconforming procedures. Therefore, the Tribune suggestion for the use of channel 31 should not be considered.


Bernard R. Segal, P.E.

December 16, 1997

CERTIFICATE OF SERVICE

I, Brenda Chapman, hereby certify that on this 17th day of December, 1997 a copy of the foregoing "Comments of Golden Orange Broadcasting Pertaining to Reply Comments of Tribune Broadcasting Submitted in Docket No. 97-157" was mailed, first-class U.S. mail, postage prepaid to the following:

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